

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

ALLSTATE INSURANCE COMPANY,  
ALLSTATE INDEMNITY COMPANY,  
ALLSTATE PROPERTY & CASUALTY INSURANCE  
COMPANY,  
ALLSTATE FIRE & CASUALTY INSURANCE COMPANY,  
AND  
ALLSTATE VEHICLE & PROPERTY INSURANCE  
COMPANY,

C.A. No.

Plaintiffs,

vs.

CHARLES J. DEMARCO, M.D.,  
DELTA DIAGNOSTIC RADIOLOGY, P.C.,  
AVALON RADIOLOGY, P.C.,  
EDWARD GORSHTEIN,  
LEONID SHUSTERMANN,  
AKKORD MANAGING SERVICES, INC., AND  
BIG APPLE MANAGING SERVICES. INC.,

Defendants.

**CERTIFICATE OF NO LIABILITY INSURANCE**

I, Richard D. King, counsel for the plaintiffs in the above-captioned matter, hereby certify  
that:

- (1) The plaintiffs are not aware of any liability insurance available to satisfy the judgment sought in this matter.
- (2) Neither I nor the plaintiffs have any reason to believe that there will be any liability insurance available to satisfy the judgment sought in this matter as the Complaint alleges intentional acts of racketeering and insurance fraud against the above-identified defendant.

[SIGNATURE PAGE FOLLOWS]

SMITH & BRINK, P.C.

*/s/ Richard D. King, Jr.*

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Dated: August 5, 2015